

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

VINCE RANALLI,

Plaintiff,

v.

AMAZON.COM LLC, ZAZZLE INC.,
ARENA MERCHANDIZING BY AND
THROUGH AMAZON.COM, LLC,
ETSY.COM, LLC, BRAVE NEW LOOK,
and OUTDOOR RESEARCH,

Defendants.

Civil Action No. 2:21-cv-0088

Judge Colville

Electronically Filed

STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure and in accordance with Amazon's Conditions of Use and the arguments made in support of Amazon.com Services LLC's Motion to Compel Arbitration [Doc. No. 9], Plaintiff Vince Ranalli and Defendant Amazon.com Services LLC,¹ hereby agree that Plaintiff's claims are subject to mandatory, individual arbitration, and therefore stipulate to the dismissal with prejudice of this civil action as to Defendant Amazon.com Services LLC. Each party shall bear their own costs and fees, including attorneys' fees, incurred in connection with this action.

¹ The entity Plaintiff sued, "Amazon.com LLC," does not presently exist. Plaintiff named "Amazon.com LLC" as an inadvertent error. This Stipulation is submitted on behalf of Amazon.com Services LLC because that is the retail entity that sold Plaintiff the product at issue and the entity that currently remits sales tax collected for the Commonwealth of Pennsylvania to the Commonwealth.

/s/ Joshua P. Ward

Joshua P. Ward, Esq.
Kyle H. Steenland, Esq.
J.P. Ward & Associates, LLC
The Rubicon Building, Suite 201
Pittsburgh, PA 15206

Counsel for Plaintiff

/s/ James L. Rockney

James L. Rockney
Pa I.D. No. 200026
Email: jrockney@reedsmith.com
Ginevra F. Ventre
Pa. I.D. No. 316897
Email: gventre@reedsmith.com
225 Fifth Avenue, Suite 1200
Pittsburgh, PA 15222
T: 412-288-3131

Brian Phelps
Pa. I.D. No. 326172
REED SMITH LLP
10 South Wacker Drive
Chicago, IL 60607
T: 312-207-2457

Counsel for Defendant Amazon.com Services LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel or parties of record electronically by CM/ECF.

/s/ James L. Rockney

James L. Rockney (PA I.D. 200026)

jrockney@reedsmith.com

Ginevra F. Ventre (PA I.D. 316897)

gventre@reedsmith.com

REED SMITH LLP

225 Fifth Avenue, Suite 1200

Pittsburgh, PA 15222-2716

Telephone: (412) 288-3131

Facsimile: (412) 288-3063

Counsel for Defendant Amazon.com Services LLC